

1 Now, here in city B is another Verizon
2 tandem in the same LATA. And so across this
3 network that AT&T established, we could establish
4 trunking between AT&T switch and this Verizon
5 tandem.

6 So, as it appears to the switches, there
7 is a direct connection from AT&T's switch to the
8 Verizon tandem. We are not directly connected.
9 Our POI is here, so Verizon--

10 MR. DYGERT: POI is at the Verizon tandem
11 in city A?

12 MR. TALBOTT: That POI continues to be in
13 Verizon city A.

14 So AT&T's network is solely between our
15 switch and their tandem, and Verizon would provide
16 the facilities between Verizon tandem in city A and
17 Verizon tandem in city B.

18 AT&T agrees that it will compensate
19 Verizon for this facility--

20 MS. FARROBA: The facility between
21 Verizon--

22 MR. TALBOTT: The two Verizon tandems, and

6:00

1 the applicable rate for that because this is
2 reciprocal comp--remember, it's on the terminating
3 side of the POI, so this falls under the rules for
4 reciprocal comp. This is dedicated transport. It
5 is not switched. Because we are going to establish
6 a trunk group, so we have a direct connection, so
7 we have dedicated transport between the two
8 tandems, so now it looks to the switches as if
9 there is a direct connection, but it's through the
10 single POI in the LATA.

11 MS. FARROBA: So, is it going through the
12 tandem switch in city A?

13 MR. TALBOTT: No. If we were going to
14 draw this with some specificity, it would actually
15 look like this.

16 MR. KEFFER: What's the "this"? You're
17 going around the switch.

18 MR. TALBOTT: There is a facility
19 connection, an intraoffice connection between the
20 POI and the facility that Verizon is going to
21 provide.

22 MR. DYGERT: That bypasses the switch?

1 MR. TALBOTT: That bypasses the switch, so
2 that the problems described by Mr. Albert this
3 afternoon are nonexistent; that we are going to
4 route traffic pursuant to the LERG, and everyone in
5 the world could find our switch because we have it
6 subtending the right tandem, and AT&T can originate
7 and terminate traffic at each and every end office
8 subtending any one of these tandems because we have
9 trunking, trunking established to those tandems,
10 regardless of where we may have our single POI. Is
11 that clear? I will be happy to answer any question
12 with respect to that.

13 MR. DYGERT: I think it's clear.
14 Mr. Grieco.

15 MR. KEFFER: While he's getting up there,
16 can we agree that that will be AT&T Exhibit 36?
17 (AT&T Exhibit No. 36 was
18 marked for identification.)

19 MR. GRIECO: I take it I'm not allowed to
20 draw on Mr. Albert's drawing?

21 Okay, that makes it a little more
22 difficult.

1 MS. KELLEY: If you drew a different
2 color, then maybe they could reduce theirs to black
3 and white and we could add the red.

4 MS. FARROBA: Before we go there, we need
5 to clarify something on the AT&T exhibit.

6 MS. PREISS: In your example, Mr. Talbott,
7 are--I'm going to sound like a broken record--are
8 city A and city B in the same local calling area?

9 MR. TALBOTT: No, not necessarily.

10 MS. PREISS: So, why does reciprocal
11 compensation apply to that call?

12 MR. TALBOTT: Everything on the
13 terminating side of the POI should be provided by
14 Verizon and compensated either as reciprocal comp
15 or under their exchange tariff. The two parties
16 have agreed that for purposes of transport, we will
17 not distinguish transport facilities, but instead
18 report factors, a percent of local usage for that
19 traffic. So that the minutes across those
20 transport facilities would be billed at the proper
21 rate. But the facilities themselves are
22 indistinguishable by the class of traffic.

1 MS. PREISS: Okay, thanks.

2 MR. DYGERT: Mr. Grieco, will it work for
3 to you do like Mr. Talbott did and draw on a fresh
4 version of the AT&T diagram, or do you need to draw
5 on the Verizon diagram?

6 MR. GRIECO: I prefer to draw on the
7 Verizon diagram, and I could do it in a different
8 color to distinguish between my additions and
9 what's there today at this moment.

10 MR. DYGERT: Will that work for Verizon?

11 MR. EDWARDS: That's not the A answer
12 because what happens in the copying of exhibits is
13 you lose the color. Unless you have--

14 MR. GRIECO: I could re-create the
15 drawing.

16 MR. EDWARDS: It's not the copying of the
17 original set of exhibits. What I'm worried about
18 is subsequent copying later on when it's in the
19 briefs.

20 MR. DYGERT: Why don't you just do a new
21 one.

22 MR. GRIECO: Okay.

1 MR. EDWARDS: I apologize. I just think
2 that's safer.

3 (Mr. Grieco draws diagram.)

4 MR. GRIECO: I would like to comment that
5 although I agree 100 percent with Mr. Talbott's
6 single POI architecture he laid out here, it's
7 really not the crux of the language on this
8 particular issue. What we were talking about was
9 single, terminating to a single tandem in the LATA,
10 and then Bell Atlantic distributing the call
11 appropriately from their one tandem.

12 So, in essence, we would have trunking
13 from our CLEC switch to one of the tandems,
14 whichever one it would be, in the LATA, and from
15 there if it was destined for end office subtending
16 this tandem, say the Warrenton tandem, the
17 Warrenton tandem would then switch that call from
18 the end office, assuming we didn't have directs to
19 that end office, and any end office subtending
20 other tandems in the LATA, Verizon would transport
21 on their existing common transport because all
22 their tandems are connected together. Did I miss

1 one?

2 MR. DYGERT: Warrenton, Fredericksburg.

3 MR. GRIECO: Okay. We could establish a
4 single trunk route to this tandem that could be run
5 more efficiently than five individual trunks to
6 five individual tandems, specifically for several
7 reasons, one of which being there could be
8 different busy hours for different traffic going to
9 different tandems, and if those things could be
10 combined onto one trunk group, they would use less
11 trunks to terminate the same amount of traffic
12 thereby relieving all of our tandem port
13 requirements from Verizon and four of their tandems
14 helping to alleviate their tandem exhaust issue.

15 And it would also be per our agreement
16 putting up direct end office trunking to any end
17 office in the LATA that had a 200,000 calls per
18 month traffic between it and our switch, and as
19 Mr. Albert said, that gets them 95 percent of the
20 way to fixing the problem right there. We have
21 this arrangement, so--

22 MS. FARROBA: Can I clarify, so you're not

1 opposed to that--what is it? 200,000 minutes? Is
2 that what it is?

3 MR. GRIECO: No. We have no problem with
4 that issue.

5 So, as we would have, in Mr. Albert's
6 example a single POI that this trunk would go
7 through, as would all of our directs to the
8 individual end offices we would connect to, by
9 having a single tandem trunk group, this trunk
10 group could be run much more efficiently than five
11 individual tandem trunk groups, reducing the
12 overall tandem port requirement in the LATA between
13 us and Verizon.

14 MS. FARROBA: How substantial would that
15 be as far as relieving some of the tandem port
16 requirements in the other tandems if you just route
17 it through a single tandem?

18 MR. GRIECO: At worst, if all of the
19 tandem trunkers that we had, if we had all five,
20 ran completely efficiently, at worst it would be
21 the same amount of tandem ports by having one trunk
22 group. And nobody runs all their trunk groups

1 completely efficiently. That just doesn't happen.

2 Besides, you lose any efficiencies you
3 could gain by different time of day peak busy
4 hours. We may have--for example, you may have a
5 large cluster of residential people in one area
6 subtending one tandem that make a lot of calls at
7 night that use this tandem connectivity only at
8 night, whereas you may have in Leesburg on a higher
9 business concentration that are using that tandem
10 connectivity during the day. If you had one tandem
11 trunk group, they could both use the same tandem
12 port, essentially potentially cutting your tandem
13 trunking in half.

14 We have this arrangement with other ILECs,
15 obviously it's technically feasible to do it.
16 We're doing it with Bell South. It works very
17 well. It does not wreak any havoc on Bell South's
18 network. The switches are basically--they don't
19 care whose NXX's call is. When it comes into its
20 switch, it's built into the translation tables and
21 it routes it to wherever it has to go.

22 As I said, it works very well for us with

1 Bell South, and we certainly feel it could be very
2 easily accommodated by Bell Atlantic.

3 MS. DAILEY: At the Warrenton tandem, is
4 that traffic that you're routing there switched or
5 is it dedicated transport?

6 MR. GRIECO: We would be having dedicated
7 trunk groups to the Warrenton tandem, and then the
8 Warrenton tandem would tandem the traffic on
9 existing Verizon--

10 MS. DAILEY: So, that is switched traffic?

11 MR. GRIECO: Yes.

12 MR. GOYAL: Just to clarify, under
13 WorldCom's proposed language, the main--would
14 WorldCom agree that the main facet of its proposal
15 that alleviate exhaustion of tandem switching
16 capability at the Warrenton tandem in this
17 hypothetical would be the agreement to engage in
18 direct end office trunking when the 200,000
19 combined minutes of use threshold is reached to
20 that end office?

21 MR. GRIECO: Yes.

22 MR. GOYAL: And if I could direct another

1 question to Mr. Talbott.

2 Under AT&T's--under Mr. Talbott's
3 explanation of his hypothetical, with trunk groups
4 from the dedicated trunks running between the CLEC
5 switch and the Verizon tandem in city A, with some
6 of those trunk groups being peeled off through a
7 cross-connect I believe or multiplexer to dedicated
8 transport on the Verizon side of the POI running
9 between the Verizon tandem in city A and the
10 Verizon tandem in city B, to the extent that there
11 is a--does AT&T agree that to the extent there is a
12 tandem switching exhaustion problem in Verizon
13 tandem A that would be alleviated by peeling off
14 those trunk groups out of the tandem switch?

15 MR. TALBOTT: Yes, there would.

16 MR. GOYAL: To the extent there is a
17 facilities exhaustion in the dedicated transport
18 between Verizon tandem in city A and Verizon tandem
19 in city B, would that be alleviated by this
20 hypothetical? Would that be alleviated in this
21 hypothetical by the peeling off of the trunk
22 groups?

1 MR. TALBOTT: Yes, because the traffic is
2 not traversing the tandem switch itself.

3 MR. GOYAL: I'm sorry, I was asking about
4 an exhaustion in the facilities between the
5 tandems.

6 MR. TALBOTT: In the facilities between
7 the tandems?

8 MR. GOYAL: Yes.

9 MR. TALBOTT: No. Verizon would be
10 expected to augment its facility network to put in
11 the necessary trunks. In other words, AT&T would
12 send an ASR to Verizon, asking to establish the
13 trunk group between a CLEC switch in city A and a
14 Verizon in tandem B, and we would give them on the
15 ASR, please cross-connect us at this point, and we
16 specify our POI. They wouldn't have to find the
17 facility capacity to do so. If there was some
18 exhaustion, they would have to then augment that
19 facility system to provide that trunk.

20 And if I could also add, I fully--

21 MS. FARROBA: Let me ask a question,
22 though. But you couldn't augment it past the point

1 where there were switch ports? I mean, you could
2 only have as much transport between the tandems as
3 there were ports--I mean, doesn't it have to go
4 into the switch and the tandem?

5 MR. TALBOTT: If there was no switch port,
6 now you're talking tandem exhaustion as opposed to
7 facility exhaustion, but it's normal for companies
8 to augment facilities because you have private line
9 requirements as well as switched service
10 requirements that may traverse that same facility
11 system.

12 MS. FARROBA: But we are not talking
13 private line here. Wouldn't we be talking switched
14 traffic?

15 MR. TALBOTT: Yes. It's just not switched
16 in city A.

17 MS. FARROBA: Right.

18 MR. TALBOTT: If I could also say, I lend
19 full support to what WorldCom's interconnection
20 architecture is, and you see you have three
21 different companies that have proposed three
22 different architectures, and I simply would ask the

1 Commission to understand we come with three
2 different business plans in addressing different
3 kinds of customers, and we shouldn't be constrained
4 into all having to go with or look alike. I don't
5 necessarily think that WorldCom's arrangement would
6 be best for AT&T, and I don't think WorldCom would
7 agree that their arrangement would be best for
8 them, and I just ask the Commission based on the
9 current rules you provide us the flexibility to
10 interconnect on a multi-station basis.

11 MR. DYGERT: I think we understand that.
12 Verizon, do you have any questions for
13 these witnesses based on these diagrams?

14 MR. EDWARDS: Mr. Grieco, you mentioned
15 the proposal or the architecture that you
16 diagrammed you're doing in Bell South territory; is
17 that correct?

18 MR. GRIECO: Yes.

19 MR. EDWARDS: Any other ILEC.

20 MR. GRIECO: I don't believe so at this
21 time. The first one was approached with the issue,
22 and they were open to it.

1 MR. EDWARDS: Are there particular states
2 where that's being done?

3 MR. GRIECO: I believe we are doing it in
4 Georgia, possibly in Florida. I can't say a
5 hundred percent for sure which, but we could find
6 out where that exists, if you like.

7 MR. EDWARDS: Do you know whether the
8 contract language provides it for it or that the
9 contract language provides for it and it's actually
10 being done today?

11 MR. GRIECO: It is being done today. I
12 would have to go look at the Bell South contracts
13 to know exactly what the language is, but I know we
14 have it today with Bell South. We use it, and it
15 works very well.

16 MR. EDWARDS: In Georgia?

17 MR. GRIECO: I know for sure in Georgia,
18 and I think in Florida, and it could be all of Bell
19 South territory for all I know.

20 MR. EDWARDS: For all you know or you
21 don't know?

22 MR. GRIECO: We could find that out very

1 easily for you.

2 MR. TALBOTT: If I might also add the Bell
3 South AT&T Interconnection Agreement has that same
4 what they call multiple tandem access, which is
5 what WorldCom is describing in the Bell South, so
6 it's present in our current agreements.

7 MR. EDWARDS: Does AT&T implement that
8 architecture in the Bell South territory?

9 MR. TALBOTT: Yes, we are using some
10 multiple tandem access in Florida, and Georgia and
11 possibly some other states.

12 MR. EDWARDS: That's all I have.

13 RECORD REQUEST

14 MR. STANLEY: Just in addition to letting
15 Verizon know, would you also let us know the answer
16 to that question about where in Bell South's
17 territory?

18 MR. GRIECO: Okay.

19 MS. KELLEY: Just to keep the record
20 clean, we should mark that as WorldCom Exhibit 49.

21 (WorldCom Exhibit No. 49 was
22 marked for identification.)

1 MS. KELLEY: And we would move that
2 exhibit in subject to reducing it and confirming
3 that the production is acceptable to the parties.

4 MR. DYGERT: Subject to seeing it later on
5 in reduced form, does Verizon have any objection?

6 MR. EDWARDS: No objection.

7 MR. DYGERT: To the AT&T exhibit also?

8 MR. EDWARDS: No objection.

9 MR. DYGERT: Okay.

10 (WorldCom Exhibit No. 49 was
11 admitted into evidence.)

12 MR. GOYAL: I have one more question of
13 Mr. Grieco.

14 When WorldCom engages in direct--when
15 WorldCom reaches the 200,000 combined minutes of
16 use threshold and engages in direct end office
17 trunking with the Verizon end office, is that
18 considered a physical point of interconnection with
19 Verizon at that end office?

20 How does WorldCom engage in that direct
21 end office trunking? Is it through the purchase of
22 UNE dedicated transport to that end office? Or

1 answer both questions, please.

2 MR. GRIECO: I'm not a hundred percent
3 clear on this issue--on that question. The concept
4 as I understand it in a single POI arrangement,
5 when we establish our point of interconnection in a
6 LATA, we build our network to that POI. When we
7 order interconnection from the LEC at that POI, a
8 trunk group would ride from our switch to the POI
9 on our network, and then would ride, would continue
10 on Bell Atlantic's network to its final
11 destination. I don't consider that to be our
12 network at that point, so I wouldn't consider the
13 end office to be a POI.

14 If we were paying for that piece, if it
15 was dedicated to us, that may change that
16 perception.

17 MR. GOYAL: Under WorldCom's proposed
18 language for direct end office interconnection when
19 it reaches the 200,000 combined minutes of us
20 threshold, how exactly would it establish the
21 direct end office trunking? What would be the
22 nature of that facility?

1 MR. GRIECO: Depending on the volume, I
2 mean, if we had DS3 going from our co-location
3 cage, if that's our point of interconnection and
4 our method of interconnection, we would have a DS3
5 maybe going to their III-1 access at the facility
6 where our POI is, and from there they would groom
7 it and put it on their common transport to get it
8 to the end office by whatever means they would
9 normally give traffic from their tandem to that end
10 office.

11 MR. GOYAL: Would it be a similar
12 configuration to the one that was drawn by
13 Mr. Talbott except that dedicated transport on the
14 other end of the Verizon tandem POI in city A, that
15 dedicated transport going to a Verizon end office?

16 MR. GRIECO: It's similar to his drawing
17 in architecture. I'm not sure about the cost
18 elements, though. I'm not really a hundred percent
19 clear what all the piece parts of the reciprocal
20 compensation rate is in our agreements.

21 MR. GOYAL: Okay. Thank you.

22 MR. EDWARDS: May I ask another question?

1 Mr. Grieco, on the right-hand side of your
2 exhibit there, you've got that bold or darkened
3 horizontal line.

4 What did you call that? Does it have a
5 name?

6 MR. GRIECO: That is the trunk group going
7 from our switch to your tandem, to the Warrenton
8 tandem. That was the closest circle on the
9 drawing. That would be the large trunk group going
10 to that tandem to represent consolidation of the
11 smaller trunk groups to the other four, combined
12 with the other one that was already going to
13 Warrenton.

14 MR. EDWARDS: So, the load on the other
15 tandems approaching exhaustion is relieved somehow
16 through that single large tandem trunk group?

17 MR. GRIECO: We're not requiring any
18 tandem trunking from you whatsoever from any of the
19 other four tandems. We disconnected those tandem
20 trunk groups. We don't have them. We only have
21 the one trunk group for Warrenton.

22 MR. EDWARDS: Who is responsible for the

1 construction of that one trunk group?

2 MR. GRIECO: Well, it would go like I just
3 said, if this was this rectangle here to the right
4 of the Warrenton tandem was our POI, if we put a
5 co-location cage inside the tandem facility
6 building, we would ride our network to the POI and
7 hand it off to Verizon, and they would take it on
8 their network into their switch.

9 MR. EDWARDS: So, would WorldCom be
10 responsible for all the construction and costs on
11 its side of the POI?

12 MR. GRIECO: Yes. And that already
13 exists.

14 MR. EDWARDS: Okay, thank you.

15 I have one housekeeping matter.

16 MR. DYGERT: All right.

17 MR. EDWARDS: I did not remember whether
18 Cox moved into the record its exhibits, and I have
19 a specific question about whether Cox Exhibit 18
20 has been moved in.

21 MR. DYGERT: By my count, Cox Exhibit 18
22 was admitted.

1 MR. HARRINGTON: That was our
2 understanding as well, because we now have a 19.

3 MR. DYGERT: I think that's the one that
4 Cox is going to submit a better paginated version
5 on.

6 MR. EDWARDS: Right.

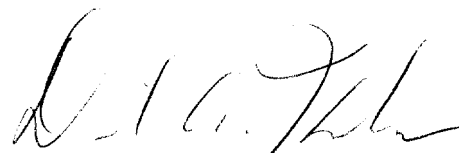
7 MR. HARRINGTON: We will resubmit a
8 repaginated version and distribute it to everybody.

9 MR. DYGERT: All right. Unless there is
10 anything else for these witnesses, they could be
11 excused. Thank you. We will see you tomorrow
12 morning. And I think we're done.

13 (Whereupon, at 6:27 p.m., the hearing was
14 adjourned until 9:30 a.m. the following day.)
15
16
17
18
19
20
21
22

C E R T I F I C A T E

I, **DAVID A. KASDAN**, RMR, the Official Court Reporter for Miller Reporting Company, Inc., hereby certify that I recorded the foregoing proceedings; that the proceedings have been reduced to typewriting by me, or under my direction and that the foregoing transcript is a correct and accurate record of the proceedings to the best of my knowledge, ability and belief.



DAVID A. KASDAN, RMR